

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	09-CR-43-SPF
)	
LINDSEY KENT SPRINGER and)	
OSCAR STILLEY,)	
)	
Defendants.)	

SPRINGER'S EX PARTE APPLICATION UNDER RULE 17(b)

Lindsey Kent Springer ("Springer") moves the Court under Rule 17(b) to order the Clerk of Court to issue subpoenas for the trial scheduled to begin on October 26, 2009, for the persons listed below for the reasons given therein. In some instances Springer seeks certain tax returns filed by the witnesses with the IRS to show certain tax treatments. Springer intends to list under production of documents those relevant persons which the Prosecution theorizes paid Springer for services rendered. Springer has identified below under the appropriate witness whether such production is sought.

Springer cannot pay for the costs associated with bringing these witnesses to trial. Springer will file with the Court in camera any information the Court requests to determine Springer's ability to pay to bring each of these relevant witnesses to trial and in most cases persons that the Prosecution has already had the opportunity to interview outside the presence of Springer. Most of the persons

listed below are out of State. Springer cannot afford the expenses associated with the subpoenas sought below.

The subpoenas under Rule 17(b) Springer seeks are for the following:

(1) Patrick Turner, (2) Patricia Turner, and (3) Friendship Enterprises are from Michigan and will provide testimony regarding the allegations in the indictment about wire transfer, usage of Stilley's Iolita Account to wire in a loan of \$ 250k in 2005, which makes up the sole claim of the Grand Jury in Count Four and how he met Springer in 2003. Mr. Turner will testify regarding his experience with ministries in general as he is a deacon of his church and his experience with Springer. He will also testify about coins he gave to Springer and what he expected for those coins as he testified before the Grand Jury. They each testified before one or two different Grand Juries.

(4) Michael Burt is in Federal Prison in Michigan and will testify regarding his support of Bondage Breaker's Ministry and Springer beginning in 2002 and how he met Springer and why he chose to support Springer and his ministry.

(5) Paul Stumpo lives in Michigan and will testify regarding his support of Bondage Breaker's Ministry and Springer beginning in 2002 and how he met Springer and why he chose to support Springer and his ministry. Stumpo will also testify about his experience with ministries and his experience with Bondage Breaker's Ministries.

(6) Arthur Hawkins, (7) Cynthia Hawkins and (8) Chippewa Trail Lodge, Inc.

are believed to be in Michigan and will provide testimony as to amounts of money given to Springer and Bondage Breaker's Ministries in 2002 and 2003. These amounts are at the heart of the Prosecution's claims in Counts Three and Five. They each testified before one of the Grand Juries. Arthur Hawkins and Cynthia Hawkins will testify that the both assisted Mr. Shern in misleading a Grand Jury. Tax Returns for both Hawkins and the Corporation are sought for 2000 through 2006.

(9) Andy Ouwenga, (10) Karen Ouwenga, (11) Erica Dirtien and (12) Loan Star Enterprises Holding Trust, are each believed to be in Michigan and are at the heart of Count Three and the theory of the liability Springer is alleged to owe. Andy Ouwenga testified before one of the many Grand Juries in this case. All of the money came Mr. Ouwenga testified about came from a Trust Account Mr. Ouwenga testified before one of the Grand Juries that he did not personally own. Mr. Ouwenga will testify he assisted Mr. Shern in misleading a Grand Jury. Ms. Dirtien will testify as to how she met Springer and what Loan Star Trust gave Springer and Bondage Breaker's Ministry financial support. Ms. Ouwenga will testify about her relationship with Springer and Jerold Barringer and how she was represented on appeal by Mr. Barringer. Tax Returns for both Ouwengas and the Trust are sought for 2000 through 2006.

(13) Denny Patridge will testify regarding his support of Bondage Breaker's Ministry and Springer beginning in late 1999 to present and how he met Springer and why he chose to support Springer and his ministry. Mr. Patridge was called

to testify before a Grand Jury.

(14) Gaylon Harrell will testify regarding his support of Bondage Breaker's Ministry and Springer beginning in 1994 and how he met Springer and why he chose to support Springer and his ministry. Mr. Harrell was found not guilty in 2000 at trial in Lathum Illinois regarding tax charges. Springer has traveled with Mr. Harrell in many States and Mr. Harrell can testify regarding Springer's mission.

(15) Jerold Barringer is an attorney from Nokomis Illinois and has been involved in numerous discussions over the last 9 years regarding Springer's mission and issues Mr. Barringer has advanced in Federal and State Courts over the past several years. Mr. Barringer is a foremost expert on the Paperwork Reduction Act of 1995, Form 83Is and how the function. Mr. Barringer was the attorney of Mr. Harrell in 2000 and Mr. Barringer is the attorney who represented Springer recently on Paperwork Reduction Act claims in the 10th Circuit dated 8.31.09 and Mr. Barringer has been involved in several cases to which Springer watched and is watching.

(16) Russell Young is out of New York and is the father of Ronald Young. Mr. Young will testify about how he met Springer and that Springer never rendered any service to him whatsoever. Mr. Young is not believed to have testified to any Grand Jury.

(17) Ronald Young is out of Florida and testified before one of the Grand Juries in this case. He will testify that he personally never gave Springer any money

whatsoever. Ronald Young will testify he assisted Mr. Shern in misleading a Grand Jury.

(18) Larry Simmons is out of Colorado and will testify how he met Springer and why he supported Springer and his mission in the past during the time of the charges in this case. Mr. Simmons did testify before one of the Grand Juries.

(19) Garlin Associated Ministries and Vikki Wiggins are currently in California and testified before at least one Grand Jury. Ms. Wiggins will testify about why Garlin Associated Ministries gave support to Springer and affirm what she stated to the Grand Jury with cross examination of course. Ms. Wiggins will testify she assisted Mr. Shern in misleading a Grand Jury. Tax Returns for Wiggins and Garlin Associated Ministries for 2000 through 2006 are sought.

(20) D.V.A.T. Trust and James Lake are in California and testified before one of the Grand Juries and it is believed Mr. Lake will testify that D.V.A.T. was a trust and that all money the Prosecution claimed to the Grand Jury came from Mr. Lake actually came from D.V.A.T. and not Mr. Lake personally. Mr. Lake will testify that Springer never rendered any service to D.V.A.T. Mr. Lake will testify that he assisted Agent Shern in misleading a Grand Jury. Tax Returns for Mr. Lake and D.V.A.T. from 1998 through 2006 are sought to be produced.

(21) Larry Logsden is from California and did testify before a Grand Jury. Mr. Logsden will testify as to why he supported Springer and his ministry during the charges in this case.

(22) Phillip Roberts, manager and Ortho/Neuro Medical Association are from Fort Smith Arkansas and have testified before one of the Grand Juries. Mr. Roberts will testify that Brian Miller audited him and specifically directed him regarding the donations Ortho/Neuro Medical Association gave to Springer in 2000. Mr. Roberts will testify he assisted Mr. Shern in misleading the Grand Jury. Tax Returns for Roberts and Ortho/Neuro Medical from 1998 through 2006 are sought.

(23) Barbara Hodsden and Mayberry 2000, LLC, and Veterinary Management Services are believed to be in Connecticut. They did testify before a Grand Jury and it is believed Ms. Hodsden will testify she assisted Mr. Shern in misleading the Grand Jury. Mayberry 2000, LLC gave support to Springer and his mission during the charges in this case. Tax Returns for Hodsden, Mayberry 2000 LLC and Veterinary Management Services are sought from 2000 through 2005.

(24) Brian Miller is a Revenue Agent with 23 years experience with the IRS. Mr. Miller and Springer have had several discussions during several venues and it is expected he will testify about each of the cases he participated in as listed in the Prosecution's Rule 16 notice. Mr. Roberts conducted the entire audit of Ortho/Neuro Medical Association in 2007.

(25) Fred Rice is in Oklahoma and is a revenue officer who has conducted many investigations regarding Springer and will testify Springer never attempted in any way to conceal any assets from the Internal Revenue Service during the time period at issue in the indictment.

(26) Donna Meadors is in Oklahoma and is a revenue officer who has conducted a thorough investigation of Springer and will testify Springer concealed nothing from her during her investigation in 2004.

(27) Nadine Griffin is Massachusettes and is someone Brian Shern referenced specifically in his Grand Jury testimony regarding the \$ 4,000 she tendered as a gift to Springer. She will testify why she gave Springer the money and how she met Springer.

(28) Carl Morris is from Oklahoma and he will testify how he met Springer and what his relationship with Springer was prior to the indictment in this case. Mr. Morris is a pastor and has experience with ministries.

(29) Eddy Patterson and Judy Patterson are from Oklahoma and they both are the central reason Brian Shern testified he began his part of the offense investigation of Springer. Mr. Patterson is expected to testify about money he gave to Springer and why he gave it and whether he owed Springer anything at the time he gave Springer the money he testified about. Mr. and Mrs. Patterson have sued Springer and Bondage Breaker's Ministry in State Court. It is expected they both will admit they falsely accused Springer of conduct they knew at the time was not true. It is believed they both will admit the assisted Brian Shern in misleading a Grand Jury. Tax Returns for both Pattersons are requested from 1996 through 2005.

(30) Tim Patterson is in Oklahoma and a hostile witness. He is expected to testify about his role working for the U.S. Attorney's office in May of 2004, assisting

them in an investigation of Oscar Stilley. Mr. Patterson received \$ 30,000 Brian Shern alleges was paid for services rendered to Springer. Mr. Patterson will testify his company received the \$ 30,000 as Tulsa Sales and Rental and not Springer. Springer seeks the tax returns of Tulsa Sales and Rental from 1999 through 2005.

(31) Steven Knorr of Oklahoma will testify he was mislead by both Douglas Horn, Melody Nelson and the Pattersons regarding Springer and Stilley. The testimony sought from Mr. Knorr is not privileged and relative to establish the truthfulness of Eddy Patterson, Judy Patterson and

(32) Tim Arsenault is in Missouri and is a Special Agent of the IRS. He was assigned to the criminal investigation of Springer in 2003. He conducted several interviews before Brian Shern took over. He attended the meetings with Douglas Horn, Melody Nelson and both Pattersons in May of 2004. He will establish the what Mr. Patterson said during those interviews about Springer and Stilley.

(33) Douglas Horn is in Oklahoma and is currently a criminal Assistant U.S.Attorney out of the Eastern District. Mr. Horn was involved in an investigation of Springer and Stilley from 2004 through 2006. Mr. Horn was also sued under Bivens by Springer and will testify about his role in the search warrant of Springer. He is expected to show he lied to Mr. Knorr about plea deals offered to Eddy and Judy Patterson through Oscar Stilley and Jerold Barringer in late 2003 or early 2004. Springer intends to show the link between Mr. Horn and Mr. Patterson regarding the

known false and misleading statements Patterson made from early 2004 up and through at late as 2008. Mr. Horn will testify as to what he traded or exchanged with Eddy Patterson in 2004 and again in 2007 in exchange for his testimony before a Grand Jury.

(34) Melody Nelson is in Oklahoma and accompanied Mr. Horn during their role as investigators of Springer and Stilley in 2003 through 2005. Ms. Nelson will testify as to what Ms. Patterson traded in exchange for a reduction in sentence to her in May and August, 2004.

(35) Neil Steirhoft is out of Rhode Island and is believed to be in Federal Prison. Mr. Steiroft will testify as to how he first met Springer and why he supported Springer's mission.

(36) Dennis Posely is believed to be in prison in New Mexico and will testify as to how he met Springer and why he supported Springer's mission. He will testify about his experiences with Springer's mission.

(37) Patricia Posely is in Arizona, the wife of Dennis Poseley and she will testify as to how she met Springer and why she supported Springer's mission. She will testify about her experiences with Springer and his mission.

(38) Beau Johnson is in Maryland and will testify as to how he met Springer and his ministry and why he was supportive of it. He will testify about his experiences with Springer and his mission.

(39) Sherry Jackson is a former IRS Agent in prison in Florida or Georgia and

will testify about Springer and his ministry and how she met Springer. She will also testify about her experiences with Springer and his mission.

(40) Bob Miles is in prison in Oklahoma and will testify about Springer and his ministry and how he met Springer. He will testify about his experiences with Springer and his mission.

(41) Richard Blackstock is in Oklahoma and will testify about Springer and his ministry and how he met Springer. He will testify about his experiences with Springer and his mission.

(42) Geoffrey Benson is believed to be in Prison in Ohio and will testify about Springer and his ministry and how he met Springer. He will testify about his experiences with Springer and his mission. He will also testify as to what happened to \$ 1.2 million that was taken by Court order from Springer and Bondage Breaker's Ministry.

(43) Denise (Russell) Jett is believed in Arkansas and previously assisted Stilley in certain office functions in Arkansas. She will testify about her experience with Springer during the time period and how she learned about Springer's mission.

(44) Ernie Swisher is in Arkansas and is believed to have testified before a Grand Jury. Mr. Swisher will testify that he was a supporter of Springer's mission and that he assisted Brian Shern in misleading the Grand Jury.

(45) Pat Mitchell is from Colorado and will testify as to how he met Springer and his ministry and why he was supportive of it. He will testify about his

experiences with Springer and his mission.

I declare the foregoing is true and correct to the best of my knowledge and belief.

Respectfully Submitted
/s/ Lindsey K. Springer
Lindsey K. Springer
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Tulsa, Oklahoma 74135
918-748-5539/955-8225(cell)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Lindsey Kent Springer's
Ex Parte Motion for Rule 17 Subpoenas was ecf'd on September 21, 2009 to:

Kenneth P. Snoke,
Charles O'Reilly,
Oscar Stilley

/s/ Lindsey K. Springer
Signature